

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PETER A. RAETSCH, GERALDINE RAETSCH, :
CURTIS C. SHIFLETT, WILLIAM FOSTER, JR., :
JOAN W. FOSTER, STANLEY C. THOMAS, and :
LARRY F. THOMPSON, individually :
and on behalf of all others similarly situated, :

Plaintiffs, :

v. :

LUCENT TECHNOLOGIES, INC., :
ALCATEL-LUCENT USA INC., :
LUCENT TECHNOLOGIES, INC. :
EMPLOYEE BENEFITS COMMITTEE, and :
LUCENT TECHNOLOGIES, INC. MEDICAL :
EXPENSE PLAN FOR RETIRED EMPLOYEES, :

Defendants. :

CIVIL ACTION NO.

2:05-cv-5134 (PGS) (ES)

CLASS ACTION

MOTION DATE:
May 18, 2009

TO: Howard Shapiro
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**AMENDED NOTICE OF PLAINTIFFS' MOTION
FOR CLASS ACTION CERTIFICATION**

PLEASE TAKE NOTICE that on Monday, May 18, 2009 at 10:00 A.M., or as soon thereafter as counsel may be heard, plaintiffs Peter A. Raetsch, et al., will move before this Court pursuant to Fed. R. Civ. P. 23 for an Order granting class action certification of this action.

PLEASE TAKE FURTHER NOTICE that in support of their Amended Motion for Class Action Certification, plaintiffs will rely upon the Amended Memorandum filed herewith (which

incorporates only minor revisions of the original supporting Memorandum), together with the Affidavits of Alan M. Sandals, David S. Preminger, and Stuart I. Wohl filed on March 13, 2009 in connection with the original motion (Docket # 97).

This amendment to the previously filed motion, and the amendments to the accompanying proposed Order and supporting Memorandum, reflect plaintiffs' filing of their First Amended Complaint on May 4, 2009 (Doc. # 109). The First Amended Complaint joins additional named plaintiffs and proposed class representatives.

An amended Memorandum and an amended proposed form of Order accompany this filing.

Dated: March 13, 2009/May 11, 2009

Respectfully submitted,

SANDALS & ASSOCIATES, P.C.

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Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Amended Notice of Plaintiffs' Renewed Motion for Class Action Certification, amended supporting Memorandum, and amended proposed Order were served upon counsel listed below on May 11, 2009 by ECF Filing and UPS Overnight Service:

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Attorneys for Defendants

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